

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>BUTCHIE LONG,</b>	:	
Petitioner,	:	<b>Civil Action</b>
v.	:	<b>NO. 19-3192</b>
<b>THOMAS MCGINLEY,</b>	:	
<i>et al.,</i>	:	
Respondents.	:	

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

1. Petitioner Butchie Long is a Pennsylvania state prisoner serving a mandatory term of life imprisonment for first-degree murder and related firearm charges.
2. On July 22, 2019, Long filed a *pro se* petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2254 with the Court. ECF 1.
3. This Court stayed Long's case until March 8, 2021, while Long exhausted claims in state court proceedings. ECF 22, 23.
4. Respondents eventually agreed with Long that an evidentiary hearing was warranted (ECF 38) and that hearing was held on March 8, 2023. ECF 46.
5. Long filed a post-hearing brief on June 27, 2023. ECF 54.
6. Before Respondents filed a response, Long filed an unopposed amended petition on November 28, 2023. ECF 62.

7. Undersigned counsel was assigned the case on July 22, 2024, after prior counsel moved to a different unit within the District Attorney's Office. ECF 70.
8. Long filed a second unopposed amended petition on October 21, 2024, raising additional claims based on newly discovered evidence. ECF 73.
9. This Court ordered Respondents to respond to Long's filings by November 20, 2024. ECF 71, then granted the undersigned's request to respond by January 21, 2025. ECF 75.
10. Unfortunately, Respondents were also unable to comply with that deadline because of the number of claims and extensive record in this case, as well as the need to review documents and notes of testimony from three other criminal cases that are related to Long's claims.
11. Respondents therefore request a 60-day extension of time in which to file a response to Long's petitions.
12. Respondents have conferred with opposing counsel regarding this motion and they do not oppose the request.

**WHEREFORE**, Respondents request that they be granted an extension of 60 days, until March 21, 2025, to file the ordered response to Long's pending petitions.

Respectfully submitted,

/s/ Mackenzie D. Hayes

MACKENZIE D. HAYES  
Assistant District Attorney

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion was served on January 21, 2025, to counsel for Petitioner, Karl D. Schwartz and Nilam A. Sanghvi, via this Court's CM/ECF electronic filing system.

/s/ Mackenzie D. Hayes  
Mackenzie D. Hayes, Esq.  
Assistant District Attorney  
Federal Litigation Unit